

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

REGINALD CLEMONS, et al.,

Plaintiffs,

v.

LT. MICHELLE BASHAM, et al.,

Defendants.

Case No. 4:22-CV-158-SRW

Hon. Mag. Judge Stephen R. Welby

JOINT PROPOSED SCHEDULING PLAN

On December 14, 2023, the Court entered an Order directing the Parties to meet and confer regarding legal issues in the case (Dckt. 69) and,

The Court ordered the Parties to submit a jointly proposed scheduling plan by January 17, 2024, addressing the upcoming briefing schedule (Dckt. 72),

THE PARTIES HAVE STIPULATED AND AGREED, subject to the approval of the Court that:

(a) The Court's Track 2 Assignment is appropriate.

(b) Plaintiffs will seek the Court's leave and file an Amended Complaint on or before

February 19, 2024. Joinder of additional parties is not anticipated.

(c) Discovery Plan

- i. The Parties will serve and accept discovery, including ESI, via email utilizing an online storage and delivery platform when necessary.
- ii. Defendants will file a Protective Order on or before **February 29, 2024**.
- iii. Initial Disclosures required by Fed. R. Civ. P. 26(a)(1) will be exchanged on or before **January 31, 2024**.

- iv. Discovery will not be conducted in phases or be limited in scope beyond those dictated by the Amended Complaint.
 - v. Expert Witnesses will be identified and reports exchanged simultaneously on or before **January 31, 2025**.
 - vi. Due to the large number of Parties represented in this case, counsel for both sides agree to limit **Depositions to fifteen (15) per side** rather than ten as suggested by Fed. R. Civ. P. 30(a)(2)(A). The Parties agree to limit **Interrogatories to twenty-five (25) per Party** as set forth in Fed. R. Civ. P. 33(a), with no limit on Requests for Production of Documents.
 - vii. Any physical or mental examinations of Parties will be requested pursuant to Fed. R. Civ. P. 35 on or before **December 13, 2024**. Requested examinations will be completed no later than **30 days** after the request is served.
 - viii. All Discovery will close by **February 28, 2025**. Fact Discovery will close on **January 17, 2025**. Expert Discovery will close on **February 28, 2025**.
 - ix. Non-Dispositive Motions will be filed on or before **February 28, 2025**.
- (d) All Parties are open to mediation or other means of Alternate Dispute Resolution at any point in the litigation. Such measures will likely be most effective after July 31, 2024.
- (e) Dispositive Motions will be filed, simultaneously with memoranda, exhibits, and other papers, on or before **March 17, 2025**.
- (f) The case should reasonably be ready for trial as early as **July 14, 2025**.
- (g) The Parties estimate **five (5) days** for trial.

Dated: January 17, 2024

Respectfully Submitted,

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